

EXHIBIT G

From: Becker, Jeff
Sent: Monday, May 15, 2023 6:43 PM
To: Marc Weinstein
Cc: Giguere, Marco; Goodwin; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd; atindel@andytindel.com; kenneth@kradamo.com; John Wang; Scott Daniels; Thomas Bejin; WillBroman; Ken Adamo
Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

Marc,

Recall that we gave you our proposed changes last Wednesday and requested a meet and confer prior to Monday to discuss your responsive changes. We also requested your proposed changes, if any, to our proposed changes prior to the meet and confer. You declined both those requests, requesting to have the meet and confer this morning, and you did not give your position on our changes in advance of the call. Given that you intended to wholesale reject all of TII's responsive edits, you could have easily provided that position in advance.

And you did not provide your formal position statement until after 2 pm today. We worked as diligently as possible under the circumstances to have our position back to you as quickly as possible. Any delay in this process is DJI's doing, not TII's.

At any rate, thank you for confirming that your draft PO does not intend to require TII to file for the applicable Chinese export license—although we note that your “typo” is consistent with Mr. Adamo's prior letter on this issue. See DJI letter from Mr. Adamo dated April 28, 2023 (“After the Code Lines are identified, DJI will provide necessary assistance to **Textron to file** an export application . . .”).

Please let us know immediately what sentences in our draft you contend contain misrepresentations so that we may consider them as you prepare your responsive changes to your proposal. Please also provide us an ETA for your edits to the joint response. We have several folks that are waiting for your confirmation that have early commitments tomorrow morning.

Thanks,
Jeff Becker

Jeffery S. Becker
Partner

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2001 Ross Avenue, Suite 900
Dallas, Texas 75201
USA



From: Marc Weinstein <marc.weinstein@XSensus.com>

Sent: Monday, May 15, 2023 7:59 PM

To: Becker, Jeff <Jeff.Becker@BakerBotts.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; WillBroman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

[EXTERNAL EMAIL]

Jeff,

In light of your submission and misrepresentations therein regarding the Western District as well as the late timing of your draft back to us, we need time to address it.

We identified a typo in DJI's proposed protective order in ¶ 13(c), and we have corrected it to state that "the *producing* Party shall obtain license or permission from competent Chinese government or agencies to allow the export of such material to the United States." (change in italics). The corrected clean version of Exhibit B is attached.

We will have Ken Adamo as the signing attorney for DJI. We will provide you our edits to the Joint Motion when completed.

Best regards,
Marc

From: Becker, Jeff <Jeff.Becker@BakerBotts.com>

Sent: Monday, May 15, 2023 6:37 PM

To: Marc Weinstein <marc.weinstein@XSensus.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; WillBroman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

Marc,

Here are TII's responsive edits with its position statement added. We propose some additional changes to the introduction paragraph to remove argumentative language, which should be fully set forth in the parties' position statements. We specifically do not agree to the addition you proposed to the introduction in your previous redline. I've also included a proposed Exhibit C.

Please confirm we have permission to file with the parties' signatures added. Please also let me know whose name to add as the signing attorney from your side.

Thanks,
Jeff Becker

From: Marc Weinstein <marc.weinstein@XSensus.com>

Sent: Monday, May 15, 2023 2:06 PM

To: Becker, Jeff <Jeff.Becker@BakerBotts.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; WillBroman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

[EXTERNAL EMAIL]

Jeff,

Here is DJI's proposed Exhibit B (clean version) and the edited version of the Joint Motion adding DJI's position statement and a small addition in the opening paragraph.

Best regards,
Marc

From: Marc Weinstein
Sent: Monday, May 15, 2023 2:24 PM
To: Becker, Jeff <Jeff.Becker@BakerBotts.com>
Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; WillBroman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>
Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

Jeff,

Thank you for preparing the drafts. We are working to get you the proposed Exhibit B and DJI position statement as soon as possible and will have them for you shortly.

Best regards,
Marc

Marc Weinstein | marc.weinstein@xsensus.com | 571-376-6319
Of Counsel to Xsensus, LLP | www.xsensus.com | 100 Daingerfield Road, Suite 402, Alexandria VA 22314 | 571-376-6333

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From: Becker, Jeff <Jeff.Becker@BakerBotts.com>
Sent: Monday, May 15, 2023 11:30 AM
To: Marc Weinstein <marc.weinstein@XSensus.com>
Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; WillBroman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>
Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

Marc,

As discussed on the meet and confer, here is the draft joint motion which refers to the three exhibits we discussed on the call and also includes placeholders for the parties' positions. I've also attached TII's proposed protective order (Exhibit A). TII's proposal has no revisions to the model order other than to update the case style and party names in the first paragraph.

Please send us your proposed Exhibit B and position statement no later than 1:30 pm central so that TII has time to prepare a responsive position statement for filing today.

Thanks,
Jeff Becker

From: Marc Weinstein <marc.weinstein@XSensus.com>

Sent: Friday, May 12, 2023 10:18 AM

To: Becker, Jeff <Jeff.Becker@BakerBotts.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; Will Broman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

[EXTERNAL EMAIL]

Jeff,

I would propose we have a meet and confer Monday morning to address the protective order and to address the source code production. Does 10:30 am ET/9:30 CT work for you and your team?

Best regards,
Marc

Marc Weinstein | marc.weinstein@xsensus.com | 571-376-6319

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From: Becker, Jeff <Jeff.Becker@BakerBotts.com>

Sent: Thursday, May 11, 2023 2:40 PM

To: Marc Weinstein <marc.weinstein@XSensus.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; Will Broman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

Marc, does DJI anticipate having further proposed changes to the proposed PO? If so, can you please provide some times for a meet and confer before Monday?

Thanks,
Jeff Becker

From: Becker, Jeff

Sent: Wednesday, May 10, 2023 12:32 PM

To: Marc Weinstein <marc.weinstein@XSensus.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; Will Broman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

Marc,

Please find attached TII's proposed responsive redlines to the PO draft you circulated last week. To the extent there are any areas of continued disagreement, please let us know some alternative times you can be available to meet and confer later this week.

Regards,
Jeff Becker

Jeffery S. Becker

Partner

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From: Marc Weinstein <marc.weinstein@XSensus.com>

Sent: Wednesday, May 3, 2023 2:59 PM

To: Becker, Jeff <Jeff.Becker@BakerBotts.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; Will Broman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

[EXTERNAL EMAIL]

Mr. Becker,

Attached is an MS Word version of the proposed edits to the protective order.

Best regards,

Marc Weinstein | marc.weinstein@xsensus.com | 571-376-6319

Of Counsel to Xsensus, LLP | www.xsensus.com | 100 Daingerfield Road, Suite 402, Alexandria VA 22314 | 571-376-6333

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From: Marc Weinstein

Sent: Wednesday, May 3, 2023 3:46 PM

To: Becker, Jeff <Jeff.Becker@BakerBotts.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; Sarah Goodwin <goodwin@b2iplaw.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd <DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang

<john.wang@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; Will Broman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: RE: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

Mr. Becker,

Further to Ken Adamo's letter sent on April 28, 2023, attached are DJI's proposed edits to the protective order.

Best regards,

Marc Weinstein | marc.weinstein@xsensus.com | 571-376-6319

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From: Sarah Goodwin <goodwin@b2iplaw.com>

Sent: Friday, April 28, 2023 5:01 PM

To: Becker, Jeff <Jeff.Becker@BakerBotts.com>

Cc: Giguere, Marco <marco.giguere@bakerbotts.com>; DL Textron Innovations Inc. v. SZ DJI Technology Co., Ltd

<DLTextronInnovationsIncvSZDJITechnologyCoLtd@BakerBotts.com>; atindel@andytindel.com; kenneth@kradamo.com; John Wang <john.wang@XSensus.com>; Marc Weinstein <marc.weinstein@XSensus.com>; Scott Daniels <scott.daniels@XSensus.com>; Thomas Bejin <bejin@b2iplaw.com>; Will Broman <Broman@b2iplaw.com>; Ken Adamo <kradamo23@gmail.com>

Subject: Textron Innovations Inc. v. SZ DJI Technology Co., Ltd. (Case No. 2:22-cv-00351-RWS-RSP)

Mr. Becker,

Please find attached correspondence from Ken Adamo.

Regards,

Sarah Goodwin, *Paralegal*

goodwin@b2iplaw.com | 313-528-4855 (direct dial)

Bejin Bieneman, PLC | 2000 Town Center, Suite 800 | Southfield, MI 48075



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